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January 6, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S.W. - Suite TW-A325
Washington, D.C. 20554

**Re: Written Ex Parte
CC Docket No. 99-273, Provision of Directory
Listing Information Under the Communications
Act of 1934, as Amended**

Dear Ms. Salas:

The purpose of this letter is to inform the Commission that Allegiance Telecom, Inc. ("Allegiance") supports the position that the Commission should adopt the rules necessary to ensure that non-carrier competitive directory assistance providers, including those acting as agents of telecommunications carriers, have nondiscriminatory access to local exchange carrier ("LEC") directory listing information at prices comparable to those paid by other providers of directory assistance services.

In recent years, the Commission's rules have required incumbent LECs to provide competitive LECs with directory assistance services at prices based on forward-looking costs. As a result of the Commission's recent decision in the *UNE Remand Order*, however, directory assistance no longer is defined as an unbundled network element pursuant to section 251(d) of the Communications Act of 1934, as amended ("Act").¹ In making the determination that directory assistance does not meet the unbundling requirements of section 251(d), the Commission largely relied on evidence of the existence of a wholesale market and opportunities for competitors to self-provision directory assistance services.² The Commission should ensure the viability of the wholesale market identified by making LEC directory listing information available to non-carrier competitive directory assistance providers on a nondiscriminatory basis.

¹ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, FCC 99-238, ¶ 442 (rel. Nov. 5, 1999) ("*UNE Remand Order*").

² *Id.*, ¶ 441.

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Ms. Magalie Roman Salas
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Without nondiscriminatory access to directory listing information, non-carrier competitive providers of directory assistance lack the ability to provide a quality alternative to the service provided by incumbent LECs and large competitive carriers. To ensure that the wholesale market identified by the Commission in the *UNE Remand Proceeding* flourishes, Allegiance submits that the Commission should adopt rules that permit non-carrier providers of competitive directory assistance service, including those acting as agents of telecommunications carriers, to have an equal opportunity to obtain LEC directory listing information.

Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. §1.1206(b)(1), an original and one copy of this letter are being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Ruth Milkman" with a stylized flourish at the end.

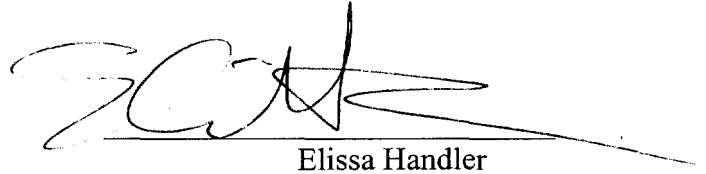
Ruth Milkman

Counsel for Allegiance Telecom, Inc.

cc: Attached Service List
Gregory M. Cooke
Charles L. Keller

CERTIFICATE OF SERVICE

I, Elissa Handler, do hereby certify that a copy of the foregoing "Written Ex Parte" was served this 6th day of January, 2000, via first-class mail, postage prepaid, upon each of the parties on the attached service list.



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